

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

NATHAN TEMPEY,

Plaintiff,

-against-

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY,

Defendant.

Case No. 20-cv-5212 (ENV)(SJB)


**DECLARATION OF ELEANOR M. LACKMAN**

ELEANOR M. LACKMAN declares as follows:

1. I am a Partner at the law firm of Mitchell Silberberg & Knupp LLP, counsel for plaintiff, Nathan Tempey. I submit this declaration in support of Plaintiff's Cross-Motion for Summary Judgment and Opposition to Defendant's Motion for Summary Judgment.
2. Attached hereto as **Exhibit 1** is a true and correct copy of the Department of Homeland Security's ("DHS" or "Defendant" first document production, sent on March 16, 2022.
3. Attached hereto as **Exhibit 2** is a true and correct copy of Defendant's second document production, sent on August 3, 2022.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 6, 2022  
New York, New York



Eleanor M. Lackman